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5/1/95

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

RM 8626-In the Amateur Service,
Proposal to eliminate
all one way transmissions
below 30 MHz

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Dear Mr/Ms Secretary:

1. It is unfortunate that the activities of a very few amateurs requires us to examine a rule that essentially has been understood and practiced by almost all operators since the beginning.
2. The tradition and practice of the Amateur Radio Service, in part, is for self training, inter communication and technical investigations (97.3a.4).
3. Broadcasting, by definition, are transmissions intended for the general public, either direct or relayed (97.3a.10).
4. Broadcasting, in any form, is prohibited (97.113a.4b). However, one way transmissions necessary to disseminate information bulletins are allowed (97.111b.6).
5. A Bulletin, according to the American Heritage Dictionary, is defined as, "a printed or broadcast statement on a matter of public interest."
6. It appears that there is a certain vagueness regarding exactly what constitutes a legal one way transmission and what does not.
7. Personally, I am concerned about any activity or practice that appears not to be in the best interest of the Amateur Service.
8. Since the Amateur Service form of communication is primarily two way exchanges of technical and self training information to promote skills and advance the art, it would appear that the number of one way information bulletins would be relatively brief and infrequent.
9. In addition, there are a vast number of supplementary means of disseminating information throughout the service including, but not limited to, packet, Amateur Radio magazines and other periodicals such as the W5YI Report.
10. Since the ARRL is the major organization representing matters of interest to the Service, it seems appropriate that they should be considered a necessary and primary source of timely information for the Amateur community. Their bulletins are transmitted in a brief and concise manner that seldom last for more than ten or fifteen minutes.

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11. Since Amateur operators operate in a communications medium and generally have vast resources available to them about on air activities, and ARRL publishes W1AW schedules, it would appear that most operators should be aware of times and frequencies that CW and information bulletins are transmitted.

12. While no one "owns" any frequency, it is generally recognized and accepted that certain activities, such as many nets, normally conduct those activities on certain frequencies so that those wishing to participate can more easily find that group.

13. Anyone who has spent any reasonable amount of time on the air, I believe, would have to conclude that the vast majority of interference that occurs, for a variety of reasons, happens during two way communications since that is the primary method of operation. It is usually incidental rather than intentional.

14. I don't believe that it is realistic that those who operate nets and transmit information bulletins can always search for a clear frequency. Obviously, others will not easily find them. I wish to be clear that any type of interference should be avoided if at all possible. However, I believe that operators should be aware of other activities, as much as possible, such as nets, information bulletins, DX windows, etc. that generally operate in certain portions of the bands.

15. It is impossible to completely eliminate this problem when so much activity occurs in our allocated spectrum. I believe that a little common sense and awareness go along way to minimizing this situation.

16. However, there is obvious abuse, in my view, by a few stations who transmit for extended periods of time in the name of information bulletins. It is important to note that these stations are NOT the source of information but simply acting as a relay.

a. There is an AM station on 160 meters who transmits by the hour, with "professional sounding announcers", and has apparently been doing so for a number of years. The "information", in my view, is basically not relevant or interesting. After all, how much is going on in the Service that justifies almost daily operations for several hours of transmissions.

b. The activities on 75 meters, by more than one station, complete with well known "guest Amateurs" to apparently justify the legitimacy of what they are doing is NOT Amateur Radio by definition or tradition.

These operators, in particular, seem to spend their on air time applauding themselves and their activities rather than providing any specific or relevant information.

17. Therefore, I propose the following:

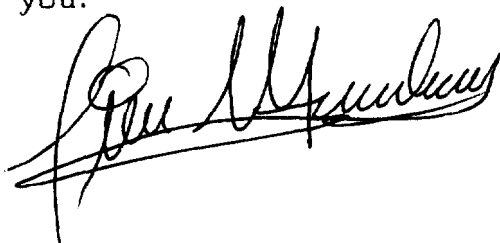
a. Even though the Service needs to be self monitoring as much as possible, those violating the rules and who have been previously served with Notices of Forfeiture must be dealt with by enforcement action by the FCC. The effects of not dealing with us has been duly noted by ARRL, W5YI and others.

b. Consider including W1AW along with the rebroadcasts of the shuttle as legitimate one way transmissions to include their existing schedule into the rules.
(97.113e)

c. Further define or modify the rules to limit the length of one way transmissions to fifteen minutes and no more than once or twice a day.

18. Finally, action must be taken. As new Amateurs, as well as others, hear these activities going on, it will only foster new stations operating in this manner. I also believe that there is the possibility that some of these stations may soon become 24 hour stations if this continues. And is music next ??

Thank you.

A handwritten signature in black ink, appearing to read "Jim Monahan", with a horizontal line drawn through the middle of the signature.

Jim Monahan, K1BNQ
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